

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Woodstone Limited Partnership;
Lofts at Farmers Market LLC,

Case No. 22-CV-1589 NEB-JFD

Plaintiffs,

v.

City of Saint Paul, Minnesota, a Minnesota
Charter City; City Council of the City of
Saint Paul; Angie Wiese, in her official
capacity as the Director of the Department
of Safety and Inspections of the City of
Saint Paul; Mayor Melvin Carter, in his
official capacity as Mayor of the City of
Saint Paul; and John Doe,

**DECLARATION OF
MEGAN D. HAFNER**

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

Megan Hafner, being first duly sworn on oath, states as follows:

1. I am an Assistant City Attorney, representing Defendants City of Saint Paul,
Minnesota, a Minnesota Charter City; City Council of the City of Saint Paul; Angie Wiese,
in her official capacity as the Director of the Department of Safety and Inspections of the
City of Saint Paul; Mayor Melvin Carter, in his official capacity as Mayor of the City of
Saint Paul, in the above-referenced matter.

2. I submit this Declaration in support of Defendants' Motion for Summary Judgment and in opposition to Plaintiffs' Motion for Partial Summary Judgment.

3. Attached as Exhibit 1 is a true and correct copy of the Saint Paul Rent Stabilization Stakeholders Group Report, dated June 2022.

4. Attached as Exhibit 2 is a true and correct copy of the University of Minnesota Center for Urban and Regional Affairs' Minneapolis Rent Stabilization Study, dated 2021.

5. Attached as Exhibit 3 is a true and correct copy of Original voter-initiated Ordinance, Chapter 193A of the City of Saint Paul's Legislative Code.

6. Attached as Exhibit 4 is a true and correct copy of City of Saint Paul Ordinance No. Ord 22-16, Amending Chapter 193A of the Legislative Code to define certain terms contained therein and ensure consistency of language used throughout.

7. Attached as Exhibit 5 is a true and correct copy of City of Saint Paul Ordinance No. Ord 22-37, Amending Chapter 193A of the Legislative Code pertaining to rent stabilization.

8. Attached as Exhibit 6 is a true and correct copy of City of Saint Paul Resolution No. RES 21-1625, Canvassing the returns and declaring the results of the City General Election held November 2, 2021.

9. Attached as Exhibit 7 is a true and correct copy of City of Saint Paul File No. PH 22-2, Public Hearing on the Rent Stabilization Stakeholder Group final report.

10. Attached as Exhibit 8 is a true and correct copy of City of Saint Paul City Charter, Chapter 8.

11. Attached as Exhibit 9 is a true and correct copy of the City of Saint Paul Rent Stabilization Notice of Final Rules, dated April 29, 2022, Bates labeled STP 00151 – 00169.

12. Attached as Exhibit 10 is a true and correct copy of the City of Saint Paul Rent Stabilization Rules and Processes, Bates labeled STP 00009 – 00036.

13. Attached as Exhibit 11 is a true and correct copy of City of Saint Paul's Rules Promulgation Processes, Bates labeled STP 00149 – 00150.

14. Attached as Exhibit 12 is a true and correct listing of City Council meeting dates during which rent stabilization was discussed; individual agendas and meeting minutes can be found at: <https://stpaul.legistar.com/Calendar.aspx>.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: November 7, 2022

s/Megan D. Hafner
Megan D. Hafner